

REMARKS

Claims 20-39 were pending at the time of the last office action. Applicant has amended claims 20, 25, 26, and 33; and neither canceled or presented any new claims. Thus, claims 20-39 are still pending.

The Examiner has objected to claim 25. Applicant has amended claim 25 to correct minor typographical errors.

The Examiner has rejected the claims under 35 U.S.C. § 103(a) as being unpatentable as outlined in the following table:

Claims	References
20-22, 26-28, and 33-35	Wilcock
23, 24, 29, 30, 36, and 37	Wilcock and Roach
25, 31, 38, and 39	Wilcock and Wengrovitz
32	Wilcock and Miller

Although applicant disagrees, applicant has amended the claims to clarify the claimed subject matter.

The claims now make it particularly clear that each "client system [has] ... hardware and software components that provide a user interface for controlling" a telephony device with which it has a "relationship" to place a call. The Examiner relies on Wilcock at Figure 3 and 7 as illustrating that "a telecom device ("endpoint system") is *monitored/controlled* by a client system ("CSM" + "STM") in exactly the way as claimed." (Office Action, Feb. 17, 2009, p. 25.) The Examiner also relies on Wilcock at Figure 21 as illustrating that a "*telephony* device is being used as an endpoint system." (Id.)

The Examiner is incorrect. The telephone illustrated in Figure 21 is not what Wilcock refers to as an "endpoint system." Wilcock makes it clear that endpoint systems are desktop computers such as "CSR desktop 74" and the system of "customer

60” as illustrated as a desktop. Wilcock specifically states that these desktops are the endpoint systems: “the web interaction service system comprises “endpoint systems (customer and CSR systems 60, 74) that can establish multi-media communication with each other.” Thus, Wilcock’s endpoint systems are desktop computers and not telephones. Moreover, Figure 3 of Wilcock illustrates that the endpoint systems 16A and 16B includes an application service interface 29, leg controller 20, endpoint connection 21, channel endpoints 22, media client 24, and application 25. There is nothing in Wilcock to suggest that Wilcock’s telephone of Figure 21 includes similar components of such an endpoint system. Wilcock’s telephones are not what Wilcock considers to be an endpoint system.

Wilcock describes a traditional call center dedicated hardware for placing calls. In particular, Wilcock describes this technology in that a “telephony contact center will have dedicated hardware for terminating and routing incoming telephone calls to CSRs. This hardware will usually have the ability to originate calls, making it possible to set up a dialback call between a CSR and a customer.” (Wilcock, ¶ 0107.) Wilcock points to U.S. Patent No. 5,848,143, which describes an example of such dedicated hardware as an Automatic Call Distribution (“ACD”) system. In a call center, telephone calls are not placed or originated via telephones controlled by a “client system.” Rather, telephone calls are originated by “dedicated hardware” controlled by software that then connects the originated call to the appropriate telephone. Nothing in Wilcock suggests anything different.

The Examiner points to Wilcock’s “CSM” + “STM” as corresponding to a client system.” Each of the claims now recite that each client system provides a “user interface for controlling” a telephony device. Wilcock’s “CSM”+ “STM” provide no user interface for controlling a telephone.

Based upon the above amendments and remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any

questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Please charge any deficiencies or credit any overpayment to our Deposit Account No. 50-0665, under Order No. 418268867US from which the undersigned is authorized to draw.

Dated: June 17, 2009

Respectfully submitted,

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